## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

LINDA J. BRUMFIELD	)
	)
Plaintiff,	) No. 08 C 2024
v.	)
	) Judge Leinenweber
CITY OF CHICAGO,	)
	) Magistrate Judge Cox
Defendants.	)
	) JURY DEMANDED

## DEFENDANT CITY OF CHICAGO'S AGREED MOTION FOR AN EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD

Defendant, City of Chicago (the "City"), by its attorney Mara S. Georges, Corporation Counsel of the City, pursuant to Federal Rule of Civil Procedure 6(b), moves this Court for an extension of time until July 9, 2008, to answer or otherwise plead to plaintiff's Complaint. In support of this motion, the City states as follows:

- 1. On April 9, 2008, plaintiff filed her Complaint in the instant case against the City. The City executed waiver of service on April 22, 2008.
  - 2. This case was recently assigned to the undersigned attorneys.
- 3. This is the City's first request for an extension of time. This request for an extension of time is not brought for purposes of delay, but rather to ensure that an accurate response is filed on behalf of the City.
- 4. In order to ensure an accurate response to plaintiff's Complaint, further investigation will be required.
- 5. Plaintiff's counsel has been consulted and agrees to the requested extension.

  Plaintiff will not be prejudiced if the requested extension of time is granted.

6. The City, hereby requests a 30-day extension of time to answer or otherwise plead to Wednesday, July 9, 2008.

**WHEREFORE**, the City requests that the Court enter an order granting the City a 30-day extension of time to Wednesday, July 9, 2008, to answer or otherwise plead to plaintiff's Complaint.

**DATED** at Chicago, Illinois on this 9<sup>th</sup> day of June, 2008.

Respectfully submitted,

MARA S. GEORGES Corporation Counsel of the City of Chicago

By: s/Robert C. Rutherford, Jr.
ROBERT C. RUTHERFORD, Jr.
MARCELA SANCHEZ AGUILAR
Assistants Corporation Counsel

Employment Litigation 30 North LaSalle Street, Suite 1020 Chicago, Illinois 60602 (312) 742-7036